

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

IN RE NEW ENGLAND COMPOUNDING  
PHARMACY, INC. PRODUCTS LIABILITY  
LITIGATION

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THIS DOCUMENT RELATES TO:

ALL CASES

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) MDL No. 2419  
) Dkt. No. 1:13-md-2419 (RWZ)  
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**BARRY J. CADDEN, LISA CONIGLIARO-CADDEN,  
GREGORY CONIGLIARO, CARL CONIGLIARO, DOUGLAS CONIGLIARO  
AND GLENN A. CHIN’S MOTION FOR LEAVE TO FILE REPLY IN RESPONSE  
TO THE SAINT THOMAS ENTITIES’ OPPOSITION TO THE  
INVOKING DEFENDANTS’ MOTIONS FOR PROTECTIVE ORDERS  
AND TO QUASH DEPOSITION NOTICES**

Pursuant to Local Rule 7.1(b)(2), Barry J. Cadden, Lisa Conigliaro-Cadden, Gregory Conigliaro, Carla Conigliaro, Douglas Conigliaro and Glenn A. Chin (Collectively, the “Invoking Defendants”) move for leave to file a Reply in Support of their Motion For A Protective Order and Motion to Quash Deposition Notices to the Invoking Defendants [Docket #1823]. On May 18, 2015, The Saint Thomas Entities’ filed an Opposition to the Invoking Defendants’ Motions for Protective Order and To Quash Depositions Notices [Docket #1869].<sup>1</sup>

A brief Reply is needed to respond to the Saint Thomas Entities’ arguments in this matter which has important ramifications to Invoking Defendants’ constitutional rights.

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<sup>1</sup> This motion for leave is joined by Medical Sales Management, Inc., Medical Sales Management SW, Inc., Ameridose, LLC, and GDC Properties Management, LLC.

Pursuant to Local Rule 7.1(a)(2), the Invoking Defendants conferred with counsel for the Saint Thomas Entities about this Motion for Leave via email on May 21, 2015, but had received no response as of the time this was filed.

Respectfully submitted,

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Dated: May 22, 2015

**CERTIFICATE OF SERVICE**

I, Michelle R. Peirce, hereby certify that this document has been filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on this date.

/s/ Michelle R. Peirce

Michelle R. Peirce

Dated: May 22, 2015